

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,)	No.	3:16-cr-045
)		
Plaintiff,)	<u>I N F O R M A T I O N</u>	
)		
v.)	WALTER HERBERT RICE	
)	18 U.S.C. § 1343	
STEVEN SCUDDER,)	18 U.S.C. § 2	
)		
Defendant.)		
)		

The United States Attorney charges:

COUNT ONE

[18 U.S.C. §§ 1343 & 2]

At all times relevant to this Information:

1. WMA Enterprises, Inc., ("WMA") was a purported investment firm that operated in the Dayton, Ohio metropolitan area. William Apostelos, the owner and operator of WMA, advised individuals who invested with his company that he would use their funds for investment purposes, including, but not limited to: acquiring stocks or securities; purchasing real estate or land; providing bridge loans/hard money loans to businesses; and buying precious metals such as gold and silver. To reassure certain investors concerning the safety of their investments with WMA, William Apostelos represented

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CLERK OF COURT
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WESTERN DIV. DAYTON

that their funds were secured by the WMA Trust, a land trust in southern Ohio.

2. Defendant **STEVEN SCUDDER** was a licensed attorney in the state of Ohio. Between approximately in or around July 2013 and in or around July 2014, defendant **STEVEN SCUDDER** served as the trustee of the WMA Trust. Defendant **STEVEN SCUDDER** ultimately resigned this position during mid-summer 2014. Despite doing so, at William Apostelos's instruction, defendant **STEVEN SCUDDER** continued to falsely hold himself out as the trustee of the WMA Trust up to and including during September 2014.

3. Beginning on an exact date unknown, but at least by in or around August 2014, and continuing through in or around September 2014, in the Southern District of Ohio, and elsewhere, defendant **STEVEN SCUDDER** and others known to the United States Attorney, acting with intent to defraud, knowingly and intentionally devised, executed, and participated in a scheme to defraud investors and to obtain money and property owned by and under the custody and control of investors, by means of materially false and fraudulent pretenses, representations, and promises, and the non-disclosure and concealment of material facts.

4. On or about the date listed below, in the Southern District of Ohio, and elsewhere, defendant **STEVEN SCUDDER** and others known

to the United States Attorney, aiding and abetting each other, for the purpose of carrying out the above-described scheme to defraud, caused the transmission of the following writings, signs, and signals, by means of wire communication in interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>INTERSTATE WIRING</u>
ONE	9/2014	Interstate telephone call between defendant STEVEN SCUDDER from the Southern District of Ohio to an individual located in another state

In violation of Title 18, United States Code, Sections 1343 and 2.

BENJAMIN C. GLASSMAN
Acting United States Attorney



LAURA I. CLEMMENS
Chief, Dayton Branch